

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
CASE NO. 1:09-CIV-05583 (JFK) (GWG)

CURTIS JAMES JACKSON, III  
p/k/a 50 CENT, TOMORROW  
TODAY ENTERTAINMENT INC.,  
a New York corporation, and  
G-UNIT RECORDS, a New York  
corporation,

Plaintiffs,

v.

LEE Q. ODENAT, a/k/a "Q," d/b/a  
[WWW.WORLDSTARHIPHOP.COM](http://WWW.WORLDSTARHIPHOP.COM),  
WORLDSTAR HIP HOP, INC., a Nevada  
Corporation; WORLDSTAR, LLC, a Delaware  
limited liability company; WSHH337, LLC,  
a Delaware limited liability company;  
JOHN DOE LLC(S)/CORPORATION(S)

Defendants,

v.

YVES MONDESIR,

Third-Party Defendant.

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**SUPPLEMENTAL COMPLAINT**

Plaintiffs, CURTIS JAMES JACKSON, III p/k/a 50 CENT, TOMORROW TODAY ENTERTAINMENT INC., a New York corporation, and G-UNIT RECORDS, a New York corporation, by and through undersigned counsel, and pursuant to Rule 15(d), Fed.R.Civ.P., file this Supplemental Complaint against Defendants WORLDSTAR HIP HOP, INC., a Nevada corporation, WORLDSTAR, LLC, a Delaware limited liability company; WSHH337, LLC, a

Delaware limited liability company, and JOHN DOE LLC(S)/CORPORATION(S) as indispensable parties in order to obtain complete relief herein, and state:

1. As set forth in the Complaint, the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com) is at the center of the underlying controversy between Plaintiffs and Defendant Odenat and the relief being sought by Plaintiffs herein. When this case was filed Mr. Odenat individually owned and was operating the website, and was sued herein as “LEE Q. ODENAT, a/k/a “Q,” d/b/a [www.worldstarhiphop.com](http://www.worldstarhiphop.com).”

2. However, subsequent to the filing of the Complaint in this matter, Defendant Odenat formed several alter-ego entities to which he has transferred assets in not-for-value transactions, including, but not limited to, ownership interests in the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com), and/or to which he has transferred operational control of the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com).

3. Defendant Odenat’s newly formed alter-ego entities include Defendant WORLDSTAR HIP HOP, INC., a Nevada corporation; Defendant WORLDSTAR, LLC, a Delaware limited liability company; and Defendant WSHH337, LLC, a Delaware limited liability company.

4. Additionally, “JOHN DOE LLC(S)/CORPORATION(S)” refers to any other unrevealed entities formed by Defendant Odenat since the filing of the Complaint herein to which he has transferred any assets in not-for-value transactions and/or operational control of the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com).

5. Because Defendant Odenat is subject to claims for punitive and exemplary damages in this matter, in order to afford complete relief herein all of Defendant Odenat’s assets, including those transferred to his subsequently formed entities after the filing of the Complaint in

this matter, should be taken in account by the Court in arriving at appropriate punitive and exemplary damages awards. Defendant Odenat and his alter-ego entities should be treated as a single entity for these purposes.

6. Additionally, Plaintiffs seek injunctive relief in this matter with regard to the operation of the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com). Any such relief should be granted against Defendant Odenat and against any entities to which he has transferred operational control of the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com).

7. This Court has jurisdiction over Defendants WORLDSTAR HIP HOP, INC., a Nevada corporation; Defendant WORLDSTAR, LLC, a Delaware limited liability company; and Defendant WSHH337, LLC, a Delaware limited liability company pursuant to New York's Long Arm Statute, CPLR 302(a)(1) as Defendants have transacted business in New York through its highly interactive website; and since these Defendants are the alter ego of Defendant Odenat over whom there is personal jurisdiction, and since Defendants have engaged in a fraudulent transfer of assets to evade the claims of Plaintiff being made in this proceeding.

WHEREFORE, in awarding punitive and exemplary damages herein, the Court should consider all assets of Defendant Odenat, including any such assets transferred subsequent to the filing of this action to Defendant Odenat's alter-ego entities and should enter judgment against such entites, and in granting injunctive relief herein the Court should order that such relief is applicable to any of Defendant Odenat's alter-ego entities to whom operational control of the website [www.worldstarhiphop.com](http://www.worldstarhiphop.com). has been transferred, and the Court should grant Plaintiffs whatever additional relief the Court deems just and proper.

Respectfully submitted,

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By: /s/Karen L. Stetson  
Karen L. Stetson  
Florida Bar No. 742937  
Jonathan L. Gaines  
Florida Bar No. 330361

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished via the CM/ECF system to: Scott Zarin, Zarin & Associates, P.C., Zarin & Associates, P.C., 1700 Broadway, Suite 3100, New York, NY 10019 and to Jon Damon Jekielek, Law Offices of Jon Jekielek, PLLC, 347 Fifth Avenue, New York, NY 10016 this 9th day of March, 2012.

By: /s/Karen L. Stetson